

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT \_\_\_\_\_

FILED

2018 AUG 24 P 3: 24

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

Ashley Harris )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
Name of plaintiff (s) )  
\_\_\_\_\_) )  
v. )  
\_\_\_\_\_) )  
Newell Brands )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
Name of defendant (s) )

Case No. 3:18-cv-351  
(to be assigned by Clerk)  
Greer / Gruyton

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Sexual Harassment and Discrimination violation  
under Title VII of the Civil Rights Act of 1964.

2. Plaintiff, Ashley Harris resides at  
3938 Big Springs Ridge Rd., Friendsville  
street address city  
Blount, TN, 37737, 865-679-0534.  
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, Newell Brands lives at, or its business is located at  
1427 William Blount Dr., Maryville,  
street address city  
Blount, TN, 37801.  
county state zip code

(if more than one defendant, provide the same information for each defendant below)

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4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

In October 2016 while employed by Newell Brands, I was sexually harassed and inappropriately touched by manager Jaime Pitner. I received sexually inappropriate text messages from Supervisor Terry McWilliams. Following I was Discriminated against by being disciplined for using the restroom.

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5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Employment Reinstatement with Backpay
- b. \$ 250,000.<sup>00</sup> in Damages
- c. \_\_\_\_\_
- d. \_\_\_\_\_

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 24<sup>th</sup> day of August, 2018.

Ashley Haus

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Signature of plaintiff (s)